

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

GULF UNDERWRITERS INS. CO.,)
as Subrogee of Games and Lanes, Inc.)
Plaintiff,)
vs.)
INTERNATIONAL BAR TECH SOLUTIONS,)
INC.)
Defendant.)

CASE NO: 04-30203-MAP

JOINT MOTION TO AMEND SCHEDULING ORDER

Plaintiff, Gulf Underwriters Ins. Co., as subrogee of Games and Lanes, Inc., and Defendant, International Bar Tech Solutions, Inc. hereby move to amend the Scheduling Order dates as follows:

1. A Scheduling Conference was held on January 27, 2005, where the Court set the following dates:

Automatic Disclosures completed by:	March 1, 2005
Written discovery served:	March 22, 2005
Non-expert depositions completed by:	July 29, 2005
Plaintiff's trial experts disclosed by:	August 30, 2005
Defendant's trial experts disclosed by:	September 30, 2005
Expert depositions completed by:	November 15, 2005
Case Management Conference:	November 18, 2005 @ 11:00 a.m.

2. The parties are conducting discovery, and are scheduling several depositions in the month of July.
3. Discovery is ongoing, but as yet, incomplete.
4. The parties propose that the Court's Scheduling Order be amended as follows:

Written discovery served:	August 30, 2005
Non-expert depositions completed by:	November 27, 2005
Plaintiff's trial experts disclosed by:	December 18, 2005
Defendant's trial experts disclosed by:	January 27, 2006
Expert depositions completed by:	March 15, 2006
Case Management Conference:	March 2006

WHEREFORE, the parties jointly request that this Honorable Court amend the Scheduling Order as set forth above.

Respectfully submitted,

PRINCE, LOBEL, GLOVSKY & TYE LLP

CURLEY & CURLEY, P.C.

Joseph S. Sano w/cos
Joseph S. Sano, BBO #545706
585 Commercial Street
Boston, MA 02109
(617) 456-8000

-and-

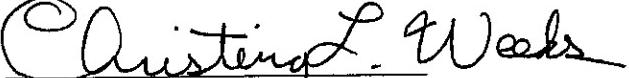
GROTEFELD & DENENBERG, L.L.C.

Christina L. Weeks
Christina L. Weeks #66106 (Pro Hac Vice)
30800 Telegraph, Suite 3858
Bingham Farms, MI 48025
248-727-7100
Attorneys for Plaintiff

Eugene F. Nowell w/cos
Eugene F. Nowell #374860
27 School Street
Boston, MA 02108
(617) 523-2990
Attorney for Defendant

CERTIFICATE OF SERVICE

I, Christina L. Weeks, hereby certify that on July 7, 2005, I served the within document by causing copies to be mailed, by first class mail, postage prepaid, to counsel of record for all parties.


Christina L. Weeks

110248_1